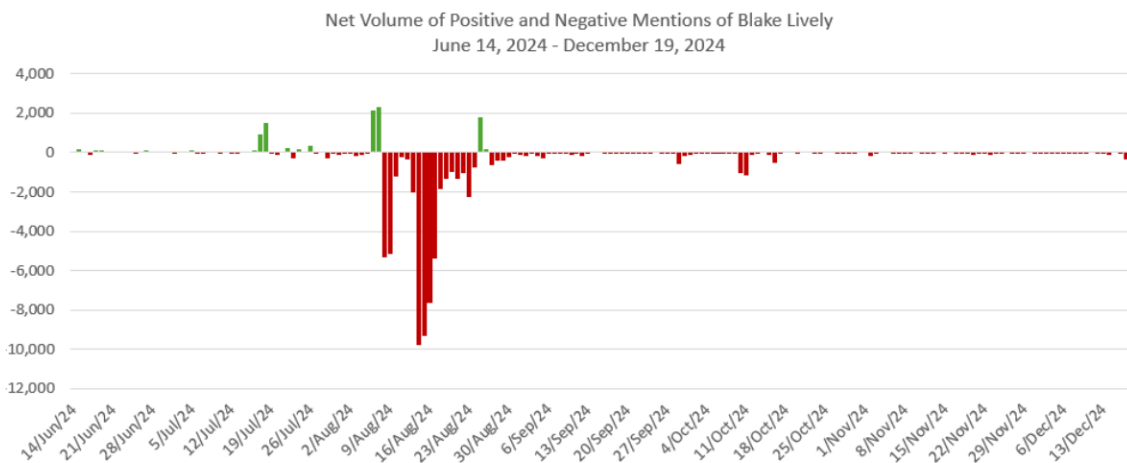


# EXHIBIT 3

## Part 4

187. The significant spike in the volume of negative sentiments toward Ms. Lively, included notable spikes on approximately August 8 and 14, 2024, and continued to trend mostly negative for the remainder of 2024:



188. Indeed, as noted above, TAG itself noted a shift due to their efforts as early as August 10, 2024.

189. As of that date, the sentiment towards Ms. Lively turned toxic, with a sudden increase in negative comments—including hypersexual content and calls for Ms. Lively to “go fuck” herself.<sup>55</sup>

190. Nearly decade-old interviews of Ms. Lively were surfaced, commenting on her tone, her posture, her diction, her language.<sup>56</sup>

<sup>55</sup> @pocketsara, X post, <https://x.com/pocketsara/status/1824146308707291152>, (Aug. 15, 2024) (“Blake Lively is a cunt”); @imtotallynotmo1, X, Aug. 15, 2024 (“You’re a piece of shit, genuinely go fuck yourself”); FluffyPinkUnicornVII, Reddit post, [https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake\\_lively\\_getting\\_criticized\\_over\\_press\\_tour/](https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake_lively_getting_criticized_over_press_tour/), (Aug. 14, 2024) (“Bottled blonde + long legs + fake tits - (brains, judgement, & humility) = Blake Lively”); KettlebellFetish Reddit post, [https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake\\_lively\\_getting\\_criticized\\_over\\_press\\_tour/](https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake_lively_getting_criticized_over_press_tour/), (Aug. 14, 2024) (“Even with the nose job, she’s such a butterface, great body, hair, but odd face and that body would be so easy to dress, just a dream body, and nothing fits right, odd clashing colors, just tacky.”); Creative\_Ad9660, Reddit post, [https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake\\_lively\\_getting\\_criticized\\_over\\_press\\_tour/](https://www.reddit.com/r/DListedCommunity/comments/1escnuy/blake_lively_getting_criticized_over_press_tour/), (Aug. 15, 2024) (“Boobs Legsly”); @chick36351, X post, (Aug. 16, 2024) (“Well Blake I a bitch.. She always has been, nice to see people realize it now... Also WAY too much plastic surgery..”); @Martin275227838, X post, <https://x.com/LizCrokin/status/1824618500431724917>, (Aug. 17, 2024) (“@blakelively is a pedophile supporting bully . . .”); @ZuperGoose, X post, (Aug. 17, 2024) (“Liz tag the bitch @blakelively Blake = pedo”); @myopinionmyfact, X post, (Aug. 22, 2024) (“... @blakelively YOU ARE SUCH A BITCH! What a horrible rude bitch you are. I cannot believe somebody fucked u, made a kid with u, married u and now has to be stuck with your bitch ass. OMG LMAO I would run!”).

<sup>56</sup> Beth Shilliday, *Blake Lively Taking a Social Media Break After Being Labeled a ‘Mean Girl’ Amid ‘It Ends With Us’ Backlash*, Yahoo Entertainment (Sept. 5, 2024, 8:04) <https://www.yahoo.com/entertainment/blake-lively-taking-social-media->

1           191.       Ms. Lively was criticized for how she was marketing the Film, she was repeatedly  
2 called a “bully,” a “mean girl,” and “controlling,” and was criticized for allegedly marginalizing Mr.  
3 Baldoni, among many other things.<sup>57</sup>

4           192.       Articles—which members of the TAG and Jonesworks team working on behalf of  
5 Mr. Baldoni and Wayfarer credited themselves with influencing—dissected Ms. Lively and contemplated  
6 her “cancellation.”<sup>58</sup>

7           193.       On information and belief, the Wayfarer team seeded social media content into  
8 publications with small audiences and lax editorial standards, and then fed those posts and/or articles to  
9 publications like *Page Six*, *Newsweek*, *NY Post*, *TMZ*, and *BuzzFeed*. These publications have larger  
10 audiences and greater reach, which significantly amplified the negative sentiment toward Ms. Lively.  
11 Content from low-influence sites was often linked or referenced in articles on these high-influence  
12  
13  
14

15 120424507.html (discussing 2016 interview of Blake Lively by Kjersti Flaa in which B. Lively “snarked” at Ms. Flaa);  
16 Francesca Bacardi, *Page Six*, *Blake Lively once snapped at reporter for asking about Penn Badgley romance: ‘I thought you*  
17 *were supposed to be classy’* (Aug. 19, 2024, 12:02) [https://pagesix.com/2024/08/19/entertainment/blake-lively-snapped-at-](https://pagesix.com/2024/08/19/entertainment/blake-lively-snapped-at-reporter-for-asking-about-penn-badgley/)  
18 *reporter-for-asking-about-penn-badgley/* (referring to 2008 interview); Gabi Duncan, *Blake Lively called out again for*  
19 *repeatedly using ‘problematic’ transgender slur in resurfaced interviews*, *Page Six*, (Aug. 18, 2024, 10:27)  
20 <https://pagesix.com/2024/08/18/entertainment/blake-lively-called-out-for-repeatedly-using-transgender-slur/> (discussing 2012  
21 interview); Marina Urman, *Blake Lively Under Fire Again For Using Transgender Slur In Multiple Resurfaced Interviews*,  
22 *BoredPanda*, (Aug. 19, 2024, 7:21) <https://www.aol.com/blake-lively-under-fire-again-142116217.html> (discussing 2008,  
23 2012, 2009, and 2016 interviews).

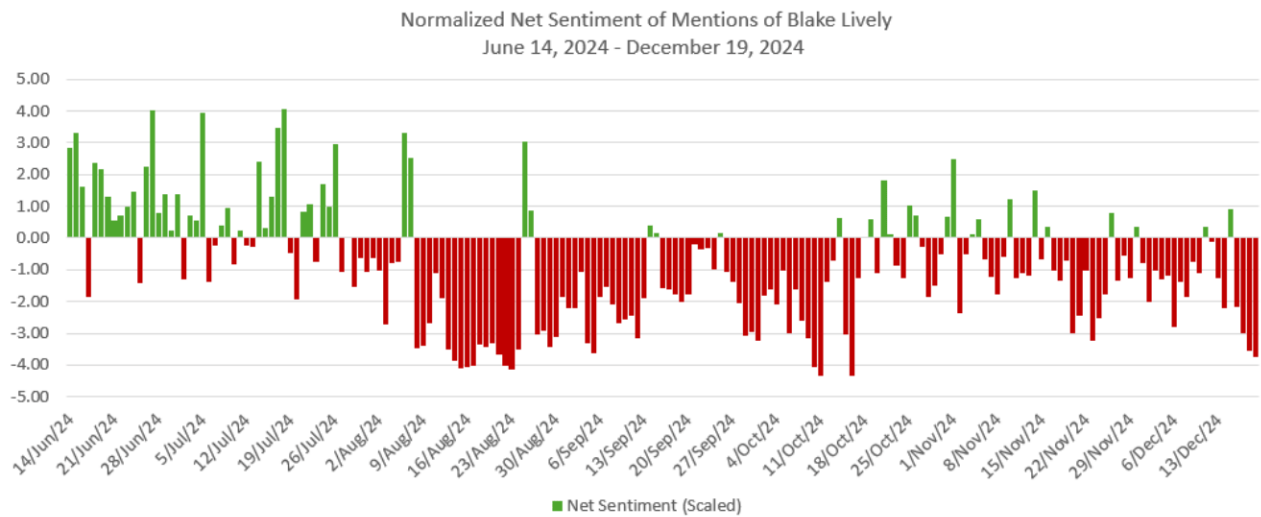
24 <sup>57</sup> Jessica Green and Alanah Khosla, *How Blake Lively keeps getting it wrong: Ryan Reynolds’ wife is criticised for glossing*  
25 *over domestic violence during press for It Ends With Us amid ‘rift’ with director - and its just the latest in a string of*  
26 *controversies for the star*, *Dailymail.com* (Aug. 15, 2024), [https://www.dailymail.co.uk/femail/article-13742675/How-Blake-](https://www.dailymail.co.uk/femail/article-13742675/How-Blake-Lively-keeps-getting-wrong-slammed-glossing-domestic-violence-Ends-Us.html)  
27 *Lively-keeps-getting-wrong-slammed-glossing-domestic-violence-Ends-Us.html*; Perez Hilton, *Blake Lively Was ‘Effortlessly*  
28 *Rude’ On It Ends With Us Set, Says Insider, But Justin Baldoni Was Problematic Too!* (Aug. 19, 2024 )  
<https://perez Hilton.com/blake-lively-effortlessly-rude-it-ends-with-us-set-justin-baldoni-problematic/> (“I got this impression  
from Justin that he was just really, really stressed and fatigued about this constant inability to control the project he was  
making... so much so that when you’d ask him questions, he’d be like, ‘Well just ask Blake’... because when Blake got there  
she would have a lot of really strong thoughts and feelings.”); Riley Cardoza, *Jana Kramer reacts to Blake Lively’s domestic*  
*violence comments, insists ‘it does define you’*, *Page Six*, (Aug. 26, 2024) [https://pagesix.com/2024/08/26/celebrity-news/jana-](https://pagesix.com/2024/08/26/celebrity-news/jana-kramer-reacts-to-blake-livelys-dv-comments-it-does-define-you/)  
*kramer-reacts-to-blake-livelys-dv-comments-it-does-define-you/* (“Lively, notably, has been slammed by social media users  
for marketing her Blake Brown haircare and Betty Buzz alcohol brand while promoting the movie.”); Kirsty McCormack,  
*Meghan McCain slams ‘insensitive’ and ‘strange’ Blake Lively over It Ends With Us controversy: ‘I don’t understand why*  
*she’s famous’*, *DailyMail.com*, (Aug. 22, 2024, 11:57) [https://www.dailymail.co.uk/femail/article-13769327/meghan-mccain-](https://www.dailymail.co.uk/femail/article-13769327/meghan-mccain-slams-blake-lively-strange-insensitive-ends-drama.html)  
*slams-blake-lively-strange-insensitive-ends-drama.html*; Giovana Gelhorn, *Blake Lively & Justin Baldoni’s Reported On-Set*  
*Clash Shows How Their Feud Really Began*, *SHEKNOWS* (Aug. 15, 2024, 11:55)  
<https://www.sheknows.com/entertainment/articles/3082123/blake-lively-justin-baldoni-feud-beginnings/> (“[Lively] wasn’t  
engaged in the filming process and wanted to get out of shooting the moment she could.”); Laura Collins, *The REAL reason*  
*why Blake Lively and Justin Baldoni’s It Ends With Us feud has upended plans for sequel*, *DailyMail.com*, (Aug. 22, 2024)  
<https://www.dailymail.co.uk/tvshowbiz/article-13766111/Blake-Lively-Justin-Baldoni-feud-upends-sequel.html>.

<sup>58</sup> See also Alanah Kholsa & Jo Tweedy, *supra* n. 29.

platforms.

194. The “social manipulation” campaign engineered by Mr. Baldoni and Wayfarer helped create and sustain a negative news cycle and social media algorithm around Ms. Lively.

195. The online narrative continues to trend more negatively as compared other weeks and months prior to the social manipulation campaign, as reflected in the sentiment chart dating from the publicity event on June 13, 2024, through to the present:



196. This was precisely the effect that the Baldoni-Wayfarer team hoped to achieve—they manipulated the social conversation to discredit and “bury” Ms. Lively in retaliation for reporting her concerns about harassing and unsafe conduct during the production of the Film, and in the hopes of deterring Ms. Lively from potentially taking those same concerns public. This campaign has been devastating to Ms. Lively, including by causing substantial harm to Ms. Lively, her family, as well as her businesses and all the people who work at each of them.

197. Unlike Wayfarer and Mr. Baldoni, Ms. Lively has been precluded from not only experiencing the success of the Film, but also from having the ability to engage further with her businesses, fans, and social media followers without immediately triggering an onslaught of hateful comments. Instead, Ms. Lively and her family have been forced to contend with a wide-reaching negative media campaign.

1           198.       When it became clear that this media blitz was the result of an *intentionally seeded*,  
2 *cultivated and financed campaign against her*, Ms. Lively began to experience mental, physical,  
3 professional, and financial harms that continue to this day.

4           199.       The effects on Ms. Lively's professional life were immediate and substantial.  
5 Given the ongoing nature of the campaign and the associated negative public sentiment, Ms. Lively did  
6 not believe she could proceed with public appearances or events without being forced to openly discuss  
7 what happened on set. For example, Ms. Lively cancelled a critical Target corporate event for her  
8 haircare company, and she backed out of her scheduled role to host the premier episode of the 50<sup>th</sup>  
9 anniversary season of Saturday Night Live in September 2024.

10           200.       The retaliation campaign against Ms. Lively has damaged her companies as well.  
11 The long-planned launch of her haircare line, Blake Brown—a date which was set more than a year prior  
12 to the date selected (not by Ms. Lively) for the release of the Film—was caught up in the crossfires of  
13 the negative environment against Ms. Lively. Initially, before the “social manipulation” campaign  
14 started, Ms. Lively was informed that Blake Brown was Target's largest haircare launch on record. Based  
15 on internal sales projections, the sudden and unexpected negative media campaign launched against Ms.  
16 Lively depressed retail sales of Blake Brown products by 56%–78%. This dramatic drop was completely  
17 at odds with the high satisfaction scores that Blake Brown products received in the significant consumer  
18 testing performed before launch or its initial success after launch.

19           201.       Around the same time, the social media accounts for Ms. Lively's brands—  
20 including Betty Buzz and Betty Booze—were flooded by hateful comments, which began to echo through  
21 other social and traditional media outlets. On information and belief, the astroturfing campaign was  
22 responsible for this wave of comments. None of Ms. Lively's businesses could operate as they ordinarily  
23 had before; instead, the Baldoni-Wayfarer astroturfing campaign forced each of Ms. Lively's businesses  
24 to go “dark” on social media in August. Ms. Lively did the same, for nearly two months, and during this  
25 time was unable to market or promote any of her businesses, all of which rely on her support, causing  
26  
27  
28



1 issues with many business partners and customers. Moreover, when Ms. Lively limited comments on  
 2 her personal Instagram account to limit the toxic harassment she was receiving, those users simply  
 3 migrated to the social media accounts and websites of Blake Brown, Betty Buzz, and Betty Booze.<sup>59</sup>  
 4 Many of the negative comments on these businesses' social media accounts and websites had nothing to  
 5 do with the products or brands, but instead referenced the Film, Mr. Baldoni, and/or Ms. Lively as a  
 6 "bully" or "mean girl."

8 202. The emotional impact on Ms. Lively has been extreme, not only affecting her, but  
 9 her family, including her husband and four children. There are days when she has struggled to get out of  
 10 bed, and she frequently chooses not to venture outside in public. While she has fought to maintain her  
 11 personal life and business interests, behind closed doors she has suffered from grief, fear, trauma, and  
 12 extreme anxiety. She also has been experiencing repeated and painful physical symptoms as a result of  
 13 this experience. Mr. Reynolds, too, has been affected mentally, physically, and professionally by his wife  
 14 and children's pain. Worst of all, however, has been the impact on their young children, who have been  
 15 traumatized and emotionally uprooted in ways that have substantially impacted their well-being.

17 203. These are but a few examples of the substantial harm caused by this malicious  
 18 campaign, which pervaded, and continues to pervade, all aspects of Ms. Lively's life. Ms. Lively never  
 19 sought out conflict with Wayfarer, Ms. Baldoni, or Mr. Heath, but instead consistently attempted to speak  
 20 up for a safe and respectful workplace privately in the hopes of protecting herself, as well as the cast and  
 21 crew, without jeopardizing a Film that she believed could make a difference in peoples' lives. In  
 22 response, Mr. Baldoni, Mr. Heath, and those working for them, sought to destroy Ms. Lively and anyone  
 23

25  
 26 <sup>59</sup> Therese AK, TikTok, <https://vm.tiktok.com/ZGeTkjarm/> (Aug. 26, 2024) ("Well now I know what NOT to buy, thank you.");  
 27 @catherinaartdesign, Blake Brown Beauty Instagram comment, (Aug. 30, 2024) ("Be ashamed! A great opportunity was  
 28 missed to share a great message through the film where it would have made a big difference in many lives. Now remember  
 'she will make up a story where she is the victim so that others feel empathy for her'"); @santerialily, Blake Brown Instagram  
 comment, (Aug. 26, 2024) ("Nobody is going to buy this crap now. Good job in ruining your brand before it even started.  
 Nasty mean girls never prosper."); @hollingsworth1830, Blake Brown Instagram comment, (Sept. 5, 2024) ("Ah, no thanks.  
 Why would anyone buy your beauty products? More overpriced junk by a vapid and narcissistic [*sic*] celebrity. I would rather  
 spend my money with someone who can actually care about women. Take this crap and your florals and sit on it.").

1 else who knew the truth. Ms. Lively's discovery of the full extent of the retaliatory campaign launched  
2 by the Wayfarer Parties has left her with no choice. Through this Complaint, Ms. Lively seeks to set the  
3 record straight, to hold the Wayfarer Parties and Associates accountable, and to shine a light on this new  
4 form of retaliation so that it will not be used against any others who seek to stand up and speak out against  
5 sexual harassment.  
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# Exhibit A



**From:** [Lindsey Strasberg](#)  
**To:** [Imene Meziane](#) [REDACTED]; [Joseph Lanius](#) [REDACTED]  
**Cc:** [David Weber](#)  
**Subject:** Lively - It Ends With Us - CONFIDENTIAL  
**Date:** Thursday, November 9, 2023 5:14:20 PM  
**Attachments:** [Lively It Ends With Us Ltr Nov 9 23.DOCX](#)

---

Dear Imene and Joseph,

With the tentative resolution of the SAG-AFTRA strike, we are writing to address how to handle a return to the set of "It Ends With Us" (the "Film"). It is no surprise to the Film's producers that the experience of shooting the Film has been deeply concerning on many levels. The complaints of our client and others have been repeatedly conveyed and well-documented throughout pre-production and photography.

While we reserve all legal rights, at this stage our client is willing to forego a more formal HR process in favor of everyone returning to work and finishing the Film as long as the set is safe moving forward. In order for our client to feel safe returning to the production, we are attaching a list of protections that will need to be guaranteed and observed by the Film's producers. If the production is unwilling to accept or uphold these protections, our client is prepared to pursue her full legal rights and remedies.

This letter is not intended to constitute a full statement of all facts and circumstances relating to this matter. It is not intended to be, nor should it be construed as, a waiver, release or relinquishment of any of our client's rights or remedies, legal or equitable, all of which are hereby expressly reserved.

Sincerely,

Lindsey

LINDSEY STRASBERG, ESQ. | **Sloane, Offer, Weber and Dern, LLP**

[REDACTED]

 Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it, may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this message is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify us by reply e-mail at [REDACTED] or by telephone at [REDACTED], and destroy the original transmission and its attachments without reading them or saving them to disk. Thank you.

**Protections for Return to Production**

In order for Blake Lively (BL) to be able to return to production on the Film, **each** of the following protections must be agreed to in writing and met without fail going forward:

1. An intimacy coordinator must be present at all times when BL is on set.
2. There must be a closed set during the rehearsal or filming of any scene involving simulated sex or nudity and any observation via remote monitors shall be restricted to essential personnel as approved by BL (to be further described in a fully-negotiated, fully-executed, SAG-compliant nudity rider (“Nudity Rider”)).
3. There is to be no spontaneous improvising of any scenes involving physical touching, simulated sex, or nudity. Scenes involving kissing, depictions of sexual intercourse, or any other physical touching must be contained in the screenplay (as approved by BL), choreographed in advance in the presence of the intimacy coordinator, and may only proceed as choreographed with the consent of all participants in advance.
4. Physical touching and/or comments on BL’s physical appearance must only be done/made in connection with the character and scene work, not as to BL personally. Except as written into the screenplay or as strictly required in connection with make-up or costume preparation, there is to be no physical touching (including hugging) of BL, her on-set personnel and/or her employees.
5. There are to be no discussions of personal experiences with sex or nudity, including as it relates to conduct with spouses or others.
6. No one will enter, attempt to enter, interrupt, pressure, or request entrance to BL’s trailer while she is in a state of undress for any reason.
7. There shall be no rehearsal or filming of any nudity and/or simulated sex without the Nudity Rider in place. Any such footage previously shot without the Nudity Rider in place, and in direct violation of SAG requirements, may not be used without BL’s and her legal representatives’ prior, written consent.
8. BL may have a representative of her choosing present with her on set for the remainder of the rehearsal and shooting days, including while on a closed set.
9. If BL is exposed to COVID-19, she must be provided notice as soon as possible after Wayfarer or any producer or production executive becomes aware of such exposure.
10. There shall be no retaliation of any kind against BL for raising concerns about the conduct described in this letter or for these requirements. Any changes in attitude, sarcasm, marginalization or other negative behavior, either on set or otherwise, including during publicity and promotional work, as a result of these requests is retaliatory and unacceptable, and will be met with immediate action.

11. Sony must have a mutually-approved representative on set for the remainder of the rehearsal and shooting days, including on a closed set, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
12. Wayfarer will engage an additional, experienced A-level producer, approved by Ms. Lively, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
13. Wayfarer must empower any existing third party producer with appropriate and customary authority to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
14. Wayfarer will engage an A-list stunt double, approved by Ms. Lively, to rehearse and perform any scenes involving the character “Lily” that depicts rape or any act of sexual violence. Ms. Lively will only perform close-up work or other pre-approved shots for such scenes.
15. Any rehearsal or shooting involving Ms. Lively, or any other performer depicting the character of “Lily,” that involves nudity (including partial nudity) or simulated sex must be conducted strictly in accordance with the Nudity Rider and must adhere to the approved script.
16. Any and all day players must be engaged through customary industry talent agencies and not through personal connections of the director and/or producer.
17. Hold an all-hands, in-person meeting before production resumes which will include the director, all producers, the Sony representative, the newly-engaged third party producer, BL and BL’s designated representatives to confirm and approve a plan for implementation of the above that will be adhered to for the physical and emotional safety of BL, her employees and all the cast and crew moving forward.

# Exhibit B

As of November 15, 2023

Blakel, Inc.  
f/s/o Blake Lively  
c/o WME Entertainment  
9601 Wilshire Blvd., 3<sup>rd</sup> Floor  
Beverly Hills, CA 90210  
Attn: Warren Zavala  
e-Mail: [REDACTED]

Copy to:  
Sloane Offer Weber and Dern LLP  
10100 Santa Monica Blvd., Suite 750  
Los Angeles, CA 90067  
Attn: David Weber and Lindsey  
Strasberg  
e-Mail: [REDACTED]

REFERENCE IS MADE to that certain actor agreement (“**Agreement**”), dated as of **May 5, 2023** between IT ENDS WITH US MOVIE, LLC (“**Company**”) and BLAKEL, INC. (“**Lender**”) for the acting and related services of Blake Lively (“**Artist**”) in connection with the motion picture currently entitled “IT ENDS WITH US” (“**Picture**”).

WHEREAS, the parties wish to confirm the conditions under which Lender has agreed to cause Artist to render acting services on the Picture following the break in production of the Picture related to the 2023 WGA and SAG-AFTRA labor strikes.

NOW THEREFORE, for good and valuable consideration, the receipt of which is hereby acknowledged, Company agrees to the following additional terms and conditions in connection with Artist’s services and use of Artist’s results and proceeds in the Picture which shall be deemed incorporated into the Agreement.

1. An intimacy coordinator must be present at all times when Artist is on set.
2. With respect to Artist, any and all rehearsal, filming, reviewing of video playback or dailies and/or any other interaction with any scene involving simulated sex, nudity and/or partial nudity shall be restricted to those persons with essential business reasons for being present (“**Essential Personnel**”) as approved by Artist and Todd Black as further described in the nudity rider attached as Schedule I hereto (“**Nudity Rider**”).
3. There is to be no spontaneous improvising of any scenes involving intimate/sexual physical touching, simulated sex, or nudity with respect to Artist. Scenes involving Artist that involves kissing, depictions of sexual intercourse, or any other intimate/sexual physical touching must be contained in the screenplay (i.e., the most up to date draft approved by Artist in writing), choreographed in advance in the presence of the intimacy coordinator, and may only proceed as choreographed with the consent of all participants in advance.
4. Physical touching and/or comments on Artist’s physical appearance must only be done/made in connection with the character and scene work, not as to Artist personally. Except as written into the screenplay or as strictly required in connection with make-up or costume preparation, there is to be no physical touching (including hugging) of Artist, her on-set personnel and/or her employees.
5. There are to be no discussions with Artist of personal experiences with sex or nudity, including as it relates to conduct with spouses or others.





6. No one will enter, attempt to enter, interrupt, pressure, or request entrance to Artist's trailer while she is in a state of undress for any reason.
7. There shall be no rehearsal or filming of Artist (including Artist's approved body double) of any nudity, partial nudity and/or simulated sex except as expressly permitted in accordance with the Nudity Rider. Any such footage of Artist (or Artist's body double) previously shot without the Nudity Rider in place may not be used without Artist's and her legal representatives' prior, written consent.
8. Artist may have a representative of her choosing present with her on set for the remainder of the rehearsal and shooting days, including while on a closed set.
9. If Artist is exposed to COVID-19, she must be provided notice as soon as possible after Wayfarer or any producer or production executive becomes aware of such exposure.
10. There shall be no retaliation of any kind against Artist for raising concerns about the conduct described in this letter or for these requirements. Any changes in attitude, sarcasm, marginalization or other negative behavior, either on set or otherwise, including during publicity and promotional work, as a result of these requests is retaliatory and unacceptable, and will be met with immediate action.
11. Except as otherwise agreed by Artist, while Artist is on set, Sony must have a mutually-approved representative (Ange Giannetti is hereby approved) on set for the remainder of the rehearsal and shooting days, including on a closed set, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
12. Wayfarer will engage an additional, experienced A-level producer, approved by Artist (Todd Black is hereby approved) (the "Approved Producer"), to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues provided that Company shall have the right to approve the agreement with the Approved Producer.
13. Wayfarer must empower any existing third party producer with appropriate and customary authority to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
14. Wayfarer will engage an A-list stunt double, approved by Artist (Lauren Shaw approved as stunt double), to rehearse and perform any scenes involving the character "Lily" that depicts rape or any act of sexual violence. Artist will only perform close-up work or other pre-approved shots for such scenes. In addition, Wayfarer to engage Artist-approved body doubles for both characters (i.e., "Lily" and "Ryle") for all simulated sex scenes (Cole Mason approved as body double for "Ryle"). Wayfarer will use reasonable good faith commercial efforts to engage the same Artist-approved individual as Artist's body double and stunt double.
15. Any rehearsal or shooting involving Artist, or any other performer depicting the character of "Lily," that involves nudity (including partial nudity) or simulated sex must be conducted strictly in accordance with the Nudity Rider and must adhere to the final, Artist-approved script. For the avoidance of doubt, there will be no use of footage in the Picture



that depicts any underage character or underage actor engaged in sexual intercourse or any form of penetration.

16. Any and all day players that participate in any way in scenes with Artist involving nudity, partial nudity and/or simulated sex must be engaged through customary industry talent agencies and not through personal connections of the director and/or producer.
17. At Artist's election, an all-hands, in-person meeting before production resumes which will include the director, the existing producers, the Sony representative, the Approved Producer, Artist and Artist's designated representatives to confirm and approve a plan for implementation of the above that will be adhered to for the physical and emotional safety of Artist, her employees and all the cast and crew moving forward.

In the event of any conflict between the terms and conditions of the Agreement and the terms and conditions of this side letter agreement, the terms and conditions of this side letter agreement shall control.

ACKNOWLEDGED, AGREED TO & ACCEPTED

**IT ENDS WITH US MOVIE LLC**

By: \_\_\_\_\_

Name: Jamey Heath

Its: President



**BLAKEL, INC.**

By: \_\_\_\_\_

Name: Blake Lively

Its: Authorized Signatory



Schedule I





Nudity Rider



## Audit trail

Title	Protection Side Letter / Lively / It Ends With Us
File name	Lively - It Ends ... ----- (002).pdf
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## Document History

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# Exhibit C

# IT ENDS WITH US

August 9, 2024

(UPDATED 7/29/24)

## LOGLINE

IT ENDS WITH US, the first Colleen Hoover novel adapted for the big screen, tells the compelling story of Lily Bloom (Blake Lively), a woman who overcomes a traumatic childhood to embark on a new life in Boston and chase a lifelong dream of opening her own business. A chance meeting with charming neurosurgeon Ryle Kincaid (Justin Baldoni) sparks an intense connection, but as the two fall deeply in love, Lily begins to see sides of Ryle that remind her of her parents' relationship. When Lily's first love, Atlas Corrigan (Brandon Sklenar), suddenly reenters her life, her relationship with Ryle is upended, and Lily realizes she must learn to rely on her own strength to make an impossible choice for her future.

Directed by Justin Baldoni and produced by Alex Saks, Jamey Heath, Blake Lively and Christy Hall. The film stars Blake Lively, Justin Baldoni, Jenny Slate, Hasan Minhaj, Amy Morton and Brandon Sklenar, from a screenplay by Christy Hall, based on the book by Colleen Hoover.

## POSITIONING

Blake Lively and Justin Baldoni are starring in the film adaptation of Colleen Hoover's highest-selling novel *It Ends With Us*.

This is the first film of the Colleen Hoover phenomena to be adapted for the big screen. She is also executive producing.

Justin Baldoni is also directing and executive producing.

As well as starring, Blake Lively is also producing.

Brandon Sklenar is perfectly cast as the charismatic Atlas who brings an impressive emotional depth to the role, along with Jenny Slate and Hasan Minhaj, who both bring compassion and humor to the film.

Teen versions of Atlas and Lily are played by up-and-coming actors Alex Neustaedter and Isabela Ferrer, who deliver exceptional performances.

IT ENDS WITH US is a big, emotional, complicated story about breaking free from the past and empowering yourself and your future. The character of Lily Bloom has resonated with so many readers because her journey is relatable – her story isn't black and white. She has to make hard decisions that have lasting consequences.

This is a story about Lily's journey from leaving a small town, moving to Boston and embarking on a whole new life. She leaves behind a complicated childhood and in doing so discovers her own resilience and strength, empowering her to stand up to adversity.

This movie has every emotion – joy, sadness, pain, and hope.

After growing up in a home where Lily witnessed her mother being abused by her father and vowing never to be in that position, she enters a relationship with Ryle and unwittingly finds herself following the same footsteps as her mother. Through this journey, Lily must learn to stand up for herself and that true strength lies within.

The book connected with millions of readers and became a rare phenomenon in the publishing world – everyone knows someone who has read this book.

Whether you have read the book or not, this is the perfect movie to see with your friends or anyone in your support system. Women all rely on their sisters, mothers, girlfriends etc for support as they navigate the ups and downs of life and so this is the perfect film to share the experience with those in their support network.

After becoming a “BookTok” cultural phenomenon with over 2 billion views on her TikTok hashtag, Colleen Hoover is currently the best-selling novelist in the US with over 25 million books sold by the end of 2023. Hoover wrote five of the top 10 best-selling print books of any genre in 2022.

Published in 43 foreign languages, *It Ends With Us* was the top selling print book of 2022, has been on the New York Times Best Seller List for over 135 weeks by the end of 2023.

#### **WHAT TO AVOID**

Focus more on Lily’s strength and resilience as opposed to describing the film as a story about domestic violence. Empowerment is not just about standing up to adversity, but also about having the power to overcome within oneself and grow from it and developing agency to shape the future.

Avoid describing the film as a love story or love triangle – it’s the story of Lily learning how to take agency of her future.

Avoid talking about this film that makes it feel sad or heavy – it’s a story of hope.

Avoid talking about the film being representative of every woman’s story. There are many stories of domestic violence, and this is just one perspective that is inspired by Colleen Hoover’s own experiences growing up.

#### **ONLY IF ASKED**

***Any questions about the story not being an authentic representation of domestic violence:***

This is just one perspective that is inspired by Colleen Hoover’s own deeply personal story of growing up in Texas.

***Any questions about the lack of diversity in the cast:***

We have such a wonderful cast who all bring something unique in telling this powerful story of one woman learning to take agency over her future. I’m so proud to be part of an incredible group of women who have to make this film that is inspired by Colleen Hoover’s own deeply personal story.



# Exhibit D

**\*\*CONFIDENTIAL\*\***

## **SCENARIO PLANNING – IT ENDS WITH US**

### **OBJECTIVE**

Protect the reputation of Justin Baldoni, Jamey Heath, and Wayfarer Studios in the lead up, during, and following the premiere of It Ends with Us, underscore the achievement and efforts of the Wayfarer team in bringing this movie to life, and emphasize Justin and the studio's commitment to their team and making the broader industry a more inclusive space.

### **OVERVIEW**

Though there are several potential scenarios at play here which we should be prepared for, should BL and her team make her grievances public – via a blatant story or subtle leak. Given she was made to compromise with the premiere, we feel she will move forward with doing so.

Our recommendation is to get ahead of this narrative, owning any misconceptions and addressing them head on. Ultimately, we need to be ready to take the air out of any story that does arise, as well as commentary and/or background narrative BL and her team put together, without being the louder antagonist.

The TAG team will continue to media monitor, flag, and respond to any media proactively reaching out / reporting on the issue and will send regular reports on existing chatter that may arise. Additionally, our team's digital experts will continue to monitor and flag any online content related to the crisis and/or mitigate if false narratives begin in the digital space.

### **Crisis Mitigation and Rapid Response**

- Our team will establish a “rapid response” communication system which keeps Justin, Jamey, and Wayfarer Studios abreast of new coverage and narrative trends in real time, both in traditional media and social media.
- Alongside Jen Abel and her team, we will manage media inquiries regarding the news on background as “sources familiar.”
- Working with legal as appropriate, we will provide information to ensure our narrative is properly represented in any and all coverage.
- TAG will confirm outlets intending on covering the story, especially those impactful to Justin, Jamey, and Wayfarer's interests, are fully briefed on the situation including and not limited to The Hollywood Reporter, Variety, Deadline, The Wrap, New York Post, Daily Mail, etc.
- We will run real-time media monitoring reports with multiple daily updates on any coverage that arises and impact that the PR teams have had on stories.
- Further, we will produce daily sentiment reports which capture the reach and attitude of opinions online related to the issue and towards Justin, Jamey, and Wayfarer. These reports will also qualify the level of impact these stories have and the gradual decrease in interest post-crisis on this narrative.

### **Preparation Materials:**

- Our team will develop clean, topline messaging outlining the facts in conjunction with Jen Abel and her team.
- Our team and Wayfarer Studios will discern what assets pertaining to communications, schedules, times when BL called out, etc. that we can share for off record and/or for context

purposes with journalists.

- Our team and Wayfarer Studios, alongside Jen Abel and team, will catalog third party advocates willing to provide a potential quote or engage with reporters on Justin and Jamey's behalf to mitigate negative narratives from a source outside of Wayfarer.
- Our team will collate a list of people who have publicly discussed their positive working experience with Justin – examples include Brandon Skylnar / Forbes, Colleen Hoover / Entertainment Weekly, etc.

#### **Key Messaging Points:**

- JB's stellar reputation among colleagues and industry peers - numerous quotes and interviews sharing positive experiences.
- JB has been a longtime activist and advocate of and for women in Hollywood, speaking out about challenges his colleagues faced before the Me Too movement even began (TED 2017).
- The "Man Enough" podcast has been a source of inspiration since it began, fostering a safe, encouraging environment for a range of perspectives to meet and discuss gender roles and how their rigidity affects everyone.
- While JB and JH attempted to foster a kind, safe, creative environment on set during a challenging period in Hollywood – resurgence of COVID-19, the writers strike, the SAG AFTRA strike – their efforts were continuously thrown back in their faces.
- Production members lost their jobs due to BL's takeover and insisted upon involvement – including loss of budget due to rescheduling shoot days when BL refused to show up.
- When BL wasn't able to get her way on set or behind the scenes, she involved her husband to create an imbalance of power between her and JB. RR went so far as to use his power to call agents and agencies, Sony, and other key players so that BL would get her way.
- BL's less than favorable reputation in the industry spans decades and has been reported – there were issues on Gossip Girl, the Town, A Simple Favor, and more.
- There is a clear, likely motive due to the film's value and fanbase, in which BL is attempting to bully her way into buying the rights for It Starts With Us.
- Our team will also include additional positive stats re: JB's career, his accolades, his inspiration to take on this project, obstacles he overcame, what's in store, etc.

#### **IF/THEN PLAN OF ACTION:**

##### **Scenario 1: Blake and team push out negative story re: Justin / Wayfarer post-premiere**

- Depending upon the scope of her push, we recommend planting a seed earlier on to position your truth / narrative around the ordeal in a subtle way to avoid having to backtrack.
- An idea for this, and working alongside Jen, is giving a friendly reporter who is covering the film a simple line hinting that while you and Blake didn't always agree at times "had our differences" you have respect for her. This way, if BL stories are softer, we don't look so aggressive. If it's a hit piece, then we've tee'd up reporters properly that there were issues with her. We would also ensure the story is broader, about the film, inspiration, etc. so that the line is one part of a larger piece.
- If her team is working on a longer lead, negative narrative, we would be given (a short) heads up in advance of the story and would, alongside Jen, correct inaccuracies in fact checking, mitigate false narratives, and point reporters toward third party advocates who can speak positively on your behalf.
- We would then brief people with a more robust version of the facts, executing a background approach, using third party advocates, and off record conversations with trusted friendlies to depict the truth of the situation. Targets would include popular industry newsletters (targeting industry peers, studio execs, investors, etc.) and social media (targeting JB's fanbase and those of

the novel/film) as well as trades / mainstream entertainment. Background information would include:

- Background briefing would clarify any misconceptions, what was taken out of context, and what can be chalked up to simple misunderstanding or miscommunication.
- Background briefing would highlight JB, JH, and Wayfarer's side of the story, what their truth is as it pertains to any allegations or negativity, facts based on the timeline, and issues they experienced on their end e.g. lost days of shooting, consistently adhering to demands, etc.
- Background briefing would include the fact that production members lost their jobs due to her involvement / takeover.
- Background briefing would include the numerous articles, interviews, and quotes of past colleagues who openly love working with Justin, and pointing to BL's less than favorable reputation of her twenty-year career.
- Background briefing would include pointing people to positive commentary, quotes, interviews from colleagues and peers of Justin praising his work, etc.

**Scenario 2: Blake subtly hints at her "experience" in post-premiere coverage, either in an interview, op ed, or otherwise.**

- Our prediction is that should BL address her "experience" on set in upcoming press, she will not name you directly but rather pepper in "easter eggs" alluding to your involvement, being mindful not to completely jeopardize her potential involvement with the film's sequel, while still planting seeds of doubt and speculation – especially amongst the passionate fan base.
- BL and her team have already begun to plant seeds around this, in insisting promotion be kept separate. Fans have already begun to speculate on socials that something is amiss.
- These pieces will likely come out following any potential hit piece and/or coverage from the premiere. Our recommended approach would be to provide reporters who reach out for comment, should it be obvious she's referring to you, with the appropriate background information (listed in Scenario 1) to ensure their stories are balanced and the speculation can be turned to another one of the many people she's had issues working with (Leighton Meester, Anna Kendrick, Ben Affleck, etc.).
- Additionally, we would advise taking further ownership of this narrative as an emerging director, lessons learned managing different egos, being the subject to an imbalance of power and/or navigating Hollywood, remaining dedicated throughout more challenging processes to protect the crew and production members, etc. – remaining strong but not specific or combative.
- This messaging can be woven into more positive press about the film, placed by Jen and team, so that you stay on the high road while sharing your truth in a respectful way. A subtle way to do this is to address some of the issues you faced on your podcast, and open the floor to discuss ways in which imbalances of Hollywood still need to be addressed, how teams can create safe environments for all cast and production members on set, etc.

**Scenario 3: Ryan comes forward in defense of his wife**

- Should Ryan come forward in defense of his wife, we would advise against any direct engagement, statement, etc.
- Inquiring reporters, and those in need of updating, would be given a pre-approved line of background, attributed to source, implying his lack of connection or involvement with the making of the film and that this is another imbalance of power and attempt to strongarm production by major A-list stars.
- Our team would also suggest (and will work with Jen Abel and her team on this) placing proactive interviews for Justin around the movie's debut, to speak to his experiences directing, what it's like to produce, direct and star in a movie, the difference between being in charge and

being one of the cast, “lessons learned” from his experience as a director on this film and others, and what’s to come in the IEWU universe.

- This will get ahead of any potential negative news placed by BL and/or her team, and seed doubt should BL or RR come forward with negative messaging.
- As part of this, our team can also explore planting stories about the weaponization of feminism and how people in BL’s circle like Taylor Swift, have been accused of utilizing these tactics to “bully” into getting what they want.